

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Comcast Cable Communications, LLC, )  
on behalf of its subsidiaries and affiliates )  
 ) CSR No. \_\_\_\_\_  
For Determination of Effective Competition in: )  
The South Washington County )  
Telecommunications Commission Franchise Area )

To: Office of the Secretary  
Attn: Chief, Media Bureau

**PETITION FOR SPECIAL RELIEF**

Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates (“Comcast”), pursuant to Sections 76.7 and 76.907 of the Commission’s rules,<sup>1</sup> requests that the Commission determine that Comcast faces “effective competition” in the five Minnesota communities that are members of the South Washington County Telecommunications Commission (“SWCTC”). The consolidated franchise area includes the communities of Cottage Grove, Grey Cloud Island, Newport, St. Paul Park, and Woodbury (“Franchise Area”).<sup>2</sup>

The Communications Act of 1934, as amended (the “Act”), and the Commission’s rules provide that cable television rates may be regulated only in the absence of effective competition.<sup>3</sup> Cable operators are entitled to demonstrate that effective competition exists on a franchise-by-

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<sup>1</sup> 47 C.F.R. §§ 76.7 and 76.907.

<sup>2</sup> In this case, the SWCTC itself is the franchise issuing authority, and it has issued a *single* franchise for the five (5) member communities. A copy of the franchise language pertaining to the definition of the “South Washington County Franchise Area” is attached hereto as Exhibit 1. The CUID Numbers corresponding to the individual member communities are set forth in Exhibit 2.

<sup>3</sup> 47 U.S.C. § 543(a)(2); 47 C.F.R. § 76.905(a).

franchise basis.<sup>4</sup> When a cable operator demonstrates that effective competition exists within a franchise area, cable rates in the affected area are no longer subject to regulation.<sup>5</sup>

Under the test set forth in Section 623(l)(1)(B) of the Act and Section 76.905(b)(2) of the Commission's rules (the "Competing Provider Test"), a cable system will be deemed subject to effective competition if:

- (i) the franchise area is served by at least two unaffiliated multichannel video programming distributors ("MVPDs"), each of which offers comparable programming to at least 50 percent of the households in the franchise area; and
- (ii) the number of households subscribing to multichannel video programming offered by MVPDs other than the largest MVPD exceeds 15 percent of the households in the franchise area.<sup>6</sup>

As demonstrated below, the Competing Provider Test is satisfied in the Franchise Area because two unaffiliated MVPDs offer comparable programming to over 50 percent of the Franchise Area's households and the reported penetration rate for these MVPD competitors exceeds the 15 percent threshold.

#### **THE COMPETING PROVIDER TEST IS SATISFIED IN THE FRANCHISE AREA**

The two prongs of the Competing Provider Test are straightforward and objective. Both prongs of this test are satisfied in the Franchise Area.

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<sup>4</sup> 47 C.F.R. § 76.907.

<sup>5</sup> See *Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992, Rate Regulation*, 8 FCC Rcd. 5631, ¶ 42(1993) ("Rate Order").

<sup>6</sup> 47 U.S.C. § 543(l)(1)(B)(i) and (ii); 47 C.F.R. § 76.905(b)(2)(i) and (ii).

**A. More Than Two Unaffiliated MVPDs Offer Comparable Programming to Over 50 Percent of the Households in the Franchise Area.**

The first prong of the Competing Provider Test requires that a franchise area must be served by “at least two unaffiliated multichannel video programming distributors....”<sup>7</sup> This requirement is satisfied because the two major direct broadcast satellite providers (DirecTV, Inc. and Dish Network Corp.) (“DBS Providers”) are unaffiliated with Comcast and offer comparable programming to more than 50 percent of the households in the Franchise Area.

MVPD service is deemed “offered” where it is both technically and actually available.<sup>8</sup> DBS service is presumed to be “technically available” throughout the country due to its nationwide satellite footprint.<sup>9</sup> As such, Comcast’s Franchise Area is entirely within the satellite footprint of both DirecTV and Dish Network.

DBS service is presumed to be “actually available” if households in a franchise area are “reasonably aware” that the service is available.<sup>10</sup> The Commission has stated that “a party may use evidence of penetration rates in the franchise area (the second prong of the competing provider test ...) coupled with the ubiquity of DBS services to show that consumers are

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<sup>7</sup> 47 U.S.C. § 543(l)(1)(B)(i); 47 C.F.R. § 76.905(b)(2)(i). Section 602 of the Communications Act of 1934, as amended, defines “multichannel video programming distributors” to include cable operators, as well as DBS and MMDS providers. See 47 U.S.C. § 522(13).

<sup>8</sup> *Rate Order* ¶ 29.

<sup>9</sup> See *MediaOne of Georgia, Inc.; Petition for Revocation of the Certification of Gwinnett County, Georgia*, 12 FCC Rcd. 19406, ¶ 5 n.16 (1997) (citing *Rate Order*, at 5660-5661).

<sup>10</sup> See *Rate Order* ¶ 32 (citations omitted). See also *Charter Communications, LLC d/b/a Charter Communications Petition for Determination of Effective Competition in Fourteen North Carolina Communities et al.*, 19 FCC Rcd. 7003, ¶ 4 (2004).

reasonably aware of the availability of DBS service.”<sup>11</sup> DirecTV and Dish Network are among the largest MVPDs in the nation.<sup>12</sup> With approximately 34 million DBS subscribers nationwide<sup>13</sup> (comprising approximately 34 percent of all MVPD subscribers),<sup>14</sup> extensive DBS advertising, and substantial DBS penetration in the Franchise Area, it is clear that consumers throughout the Franchise Area are “reasonably aware” of the availability of Comcast’s DBS competitors.<sup>15</sup>

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<sup>11</sup> *Comcast Cable Communications, LLC Petition for Determination of Effective Competition in Various Michigan Communities*, 23 FCC Rcd. 9595, ¶ 5 (2008) (“*Comcast – Various Michigan Communities*”) (citing *Mediacom Illinois LLC et al., Eleven Petitions for Determination of Effective Competition in Twenty-Two Local Franchise Areas in Illinois and Michigan*, 21 FCC Rcd. 1175 (2006)). Thus, the Commission has not required the production of advertising to demonstrate that households in the franchise area are “reasonably aware” of the availability of DBS service. See *Bright House Networks, LLC Petition for Determination of Effective Competition (Lake Alfred and Dundee, FL)*, 22 FCC Rcd. 4390, ¶ 6 (2007) (“*Bright House Networks – Florida*”) (“Over more than ten years, we have made hundreds of findings that households in particular franchise areas are reasonably aware that they may purchase DBS services based on localized evidence. These accumulated showings amount to substantial evidence that households in all franchise areas are reasonably aware that they may purchase DBS services. In at least one earlier reported decision, we found households in a franchise area to be reasonably aware that they may purchase DBS service solely based on evidence of DBS’s nationwide growth and local subscriptions, without reference to advertising or other promotion.”).

<sup>12</sup> See *Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming (Fourteenth Order)*, 27 FCC Rcd. 8610, ¶ 31 (2012) (“*14<sup>th</sup> Report*”).

<sup>13</sup> See Press Release, DirecTV, *DirecTV Announces Fourth Quarter and Full Year 2012 Results* (Feb. 14, 2013) (reporting that, as of December 31, 2012, DirecTV (US) had 20.084 million subscribers), available at <http://investor.directv.com/releasedetail.cfm?ReleaseID=740312>; Press Release, DISH Network, *DISH Reports Year End 2012 Financial Results* (Feb. 20, 2013) (reporting that, as of December 31, 2012, Dish Network had approximately 14.056 million subscribers), available at <http://dish.client.shareholder.com/releasedetail.cfm?ReleaseID=741643>.

<sup>14</sup> See *14<sup>th</sup> Report* ¶ 31. See also Georg Szalai, *U.S. Pay-TV Industry Sub Growth Hits Low in 2012*, The Hollywood Reporter, Mar. 11, 2013 (citing SNL Kagan report of 100.4 million video subscribers by the end of 2012), available at <http://www.hollywoodreporter.com/news/us-pay-tv-industry-growth-427390>.

<sup>15</sup> See, e.g., *Comcast – Various Michigan Communities* ¶ 5; *Bright House Networks – Florida* ¶ 6.



The Competing Provider Test also requires that the programming offered by these competing providers must be “comparable” to the programming offered by the petitioning cable operator.<sup>16</sup> The Commission’s rules expressly define comparable programming as “at least 12 channels of video programming, including at least one channel of nonbroadcast service programming.”<sup>17</sup> The Commission has repeatedly recognized that the DBS Providers offer comparable programming to Comcast and other cable operators under the Commission’s Competing Provider Test.<sup>18</sup> Each of the DBS Providers offer well over 100 video channels, most of which are non-broadcast services.<sup>19</sup> And, as shown in the attached channel line-up, Comcast’s programming service offerings in the Franchise Area are substantially similar to the DBS Providers’ programming services.<sup>20</sup>

Based on the above facts, the first prong of the Competing Provider Test is satisfied in the Franchise Area.<sup>21</sup>

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<sup>16</sup> See 47 U.S.C. § 543(l)(1)(B)(i); 47 C.F.R. § 76.905(b)(2)(i).

<sup>17</sup> 47 C.F.R. § 76.905(g).

<sup>18</sup> See, e.g., *Comcast Cablevision of Maryland, Inc., Petitions for Determination of Effective Competition (Charles County, MD)*, 19 FCC Rcd. 7130, ¶ 4 (2004) (“We find that the programming of DBS providers satisfies the Commission’s program comparability criterion because DBS providers offer more than 12 channels of video programming, including more than one non-broadcast channel.”).

<sup>19</sup> See Channel Line-ups of DirecTV and Dish Network, attached hereto as Exhibit 3.

<sup>20</sup> See Comcast Channel Line-up, attached hereto as Exhibit 4.

<sup>21</sup> All of the legal positions taken above regarding the first prong of the Competing Provider Test were confirmed by the Commission in *Comcast Cable Communications, LLC, Petition for Determination of Effective Competition in Nine Minnesota Franchise Areas*, DA 13-862, ¶ 6 (rel. Apr. 24, 2013) (“*Comcast – Nine Minnesota Franchise Areas*”), and *Comcast Cable Communications, LLC, Petition for Determination of Effective Competition in Six Blaine, Minnesota Franchise Areas*, DA 13-863, ¶ 7 (rel. Apr. 24, 2013) (“*Comcast – Six Blaine, MN Franchise Areas*”).

**B. The Competing DBS Providers Serve More Than 15 Percent of the Households In the Franchise Area.**

The second prong of the Competing Provider Test requires that the aggregate subscribership of competing MVPDs, other than the largest MVPD, exceeds 15 percent of franchise area households.<sup>22</sup>

DBS Providers track their subscribers according to the ZIP Codes where each subscriber resides, rather than by political jurisdiction. In this case, Comcast relied on ZIP+4 codes associated with each of the communities in the Franchise Area in order to determine the number of DBS subscribers within the Franchise Area. The Commission has previously accepted ZIP+4 codes as “reasonable and sufficiently reliable for purposes of determining the presence of effective competition,”<sup>23</sup> and stated its preference for this approach.<sup>24</sup>

To determine the relevant ZIP+4 codes for the Franchise Area communities, Comcast first contacted SNL Kagan (“SNL,” formerly known as “Media Business Corp.”). SNL has developed a process to accurately identify the ZIP+4 codes that correspond with the political boundaries of a particular community. This process utilizes enhanced mapping software that correlates ZIP+4 codes with political boundaries. With this software, SNL was able to identify the ZIP+4 codes that lie within the Franchise Area.<sup>25</sup>

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<sup>22</sup> 47 U.S.C. § 543(l)(1)(B)(ii); 47 C.F.R. § 76.905(b)(2)(ii).

<sup>23</sup> See *Cable One, Inc. Petition for Determination of Effective Competition in Pocatello, Idaho*, 18 FCC Rcd. 12792, ¶ 8 (2003) (quoting *Falcon Cable Systems II, a California Limited Partnership, d/b/a Charter Communications Petition for Determination of Effective Competition in Twelve Oregon Cities*, 17 FCC Rcd. 4648 (2002)).

<sup>24</sup> See Public Notice, “Commission Announces New Standards for Showings of Effective Competition For Cable Service,” 23 FCC Rcd. 12067 (2008); Public Notice, “Commission Clarifies Standards for Evidence of Competing Provider Effective Competition for Cable Service,” 24 FCC Rcd. 8198 (2009).

<sup>25</sup> See Letter from SNL (explaining ZIP+4 methodology), attached hereto as Exhibit 5.

Comcast next provided all of the ZIP+4 codes identified for the Franchise Area to the Satellite Broadcasting and Communication Association (“SBCA”). SBCA is the national trade association representing the two major DBS Providers, and it has assumed the responsibility for compiling subscribership data and responding to data requests from cable operators and franchising authorities engaged in effective competition proceedings. The DBS subscriber numbers reported in the attached Effective Competition Tracking Reports (“ECTRs”) from SBCA reflect the total DBS subscribers within the individual ZIP+4 codes associated with the Franchise Area.<sup>26</sup>

To determine whether the competing providers’ subscribership exceeds the 15 percent threshold in the Franchise Area, Comcast compared the DBS subscribership data reported by SCBA with most recent “occupied household unit” figures reported by the U.S. Census.<sup>27</sup> This comparison yields a penetration rate of 27.25 percent for DBS Providers in the Franchise Area.<sup>28</sup>

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<sup>26</sup> See Exhibit 6 (providing total ZIP+4-based DBS subscribership for each community in the Franchise Area, as well as all ZIP+4 data relied on in the Petition).

<sup>27</sup> See Exhibit 7. The Commission has consistently approved cable operators’ reliance on decennial Census data in effective competition cases. See, e.g., *Comcast – Nine Minnesota Franchise Areas* ¶ 14 (denying local franchising authorities objection to the use of 2000 Census data and their attempt to substitute regional estimates); *Comcast – Six Blaine, MN Franchise Areas* ¶ 17; *Mediacom Minnesota*, 18 FCC Rcd. 12768, ¶ 8 (2003); *Thompson Cable Vision Company*, 17 FCC Rcd. 22679, ¶ 3 (2002).

<sup>28</sup> See Exhibit 8.

The subscriber penetration rate for the DBS Providers in the Franchise Area exceeds the 15 percent threshold required under Section 623(l)(1)(B) of the Act.<sup>29</sup> Accordingly, these providers satisfy the second prong of the Competing Provider Test.<sup>30</sup>

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<sup>29</sup> Significantly, the 15 percent threshold is satisfied not only for the single consolidated Franchise Area, but for each of the five constituent member SWCTC communities:

<u>Community</u>	<u>DBS Penetration</u>
Cottage Grove	28.71%
Grey Cloud Island	26.32%
Newport	21.64%
St. Paul Park	26.90%
Woodbury	26.87%

*See* Exhibit 8.

<sup>30</sup> Comcast has confirmed that it is the largest MVPD in each of the Franchise Areas. *See* Declaration of Warren Fitting attached hereto.

## **CONCLUSION**

Comcast's cable system is subject to effective competition in the Franchise Area under the two-prong Competing Provider Test. Based on the straightforward and objective evidence presented herein, Comcast respectfully requests that the Media Bureau issue an order acknowledging the presence of effective competition in the South Washington County Telecommunications Commission Franchise Area as of the filing date of this Petition.<sup>31</sup>

Respectfully submitted,

**Comcast Cable Communications, LLC**  
**on behalf of its subsidiaries and affiliates**

By: 

Wesley R. Heppler  
Steven J. Horvitz  
Frederick W. Giroux

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(202) 973-4200

May 13, 2013

Its Attorneys

cc: Steven Broeckaert  
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John Norton  
Holly Saurer

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<sup>31</sup> See, e.g., *Time Warner Entertainment-Advance/Newhouse Partnership*, 26 FCC Rcd. 3829, ¶ 28 (2011) ("Consistent with our longstanding practice, the order herein is effective as of the date the petition herein was filed.") (footnote omitted). See also *Charter Communications Entertainment I LLC*, 26 FCC Rcd. 5975, ¶ 28 (2011).

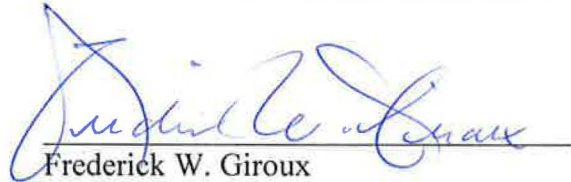
**CERTIFICATION PURSUANT TO 47 C.F.R. § 76.6(a)(4)**

The below-signed signatory has read the foregoing Petition for Special Relief, and to the best of my knowledge, information, and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law; and is not interposed for any improper purpose.

Respectfully submitted,

**Comcast Cable Communications, LLC**  
**on behalf of its subsidiaries and affiliates**

By:



Frederick W. Giroux

**Davis Wright Tremaine LLP**  
1919 Pennsylvania Avenue, N.W., Suite 800  
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(202) 973-4200

May 13, 2013

Its Attorneys

## DECLARATION OF WARREN FITTING

I, Warren Fitting, declare, under penalty of perjury that:

1. I am the Senior Director of Regulatory Accounting for Comcast Cable Communications, LLC ("Comcast").
2. I have read the foregoing Petition for Special Relief ("Petition") and am familiar with the contents thereof and the matters referred to therein.
3. I have reviewed Comcast's respective cable subscriber numbers for the Franchise Area at issue in this Petition, as well as the DBS subscriber numbers provided by SBCA for the Franchise Area as described in the Petition. Comcast is the largest multichannel video programming distributor in the South Washington County Telecommunication Commission Franchise Area as well as in each of the five communities that make up the South Washington County Telecommunications Commission.
4. The facts contained within the Petition are true and correct to the best of my knowledge, information, and belief.

Date

May 7, 2013

Warren A. Fitting  
Warren Fitting

## **EXHIBIT 1**



**ORIGINAL**

ORDINANCE NO. 10-30-02  
South Washington County Telecommunications Commission

**CABLE TELEVISION FRANCHISE ORDINANCE.**

**Date: October 30, 2002**

**Prepared by:**

**Creighton, Bradley & Guzzetta, LLC**  
**5402 Parkdale Drive, Suite 102**  
**Minneapolis, Minnesota 55416**  
**Telephone: (952) 543-1400**  
**Facsimile: (952) 543-8866**

Revenues in the period collected; (ii) any taxes on services furnished by the Grantee imposed by any municipality, state or other governmental unit, provided that franchise fees shall not be regarded as such a tax; (iii) FCC regulatory fees; (iv) Subscriber credits, adjustments or refunds; (v) PEG Fees; or (vi) refundable Subscriber deposits. As previously stated in the definition of "Cable Services" as to cable modem service, the parties agree to comply with future applicable federal or State law or regulation as to the inclusion of fees for such service being included or excluded from the definition of "Gross Revenues."

1.2.16 "**Installation**" means the connection of the System from feeder cable to the point of connection with the Subscriber Converter or other terminal equipment.

1.2.17 "**Institutional Network**" or "**I-Net**" means the discrete hybrid fiber-coaxial, bi-directional communications network and services related to such network provided by the Grantee to identified institutions as required by this Franchise, and as further described in Section 7 herein.

1.2.18 "**Leased Access Channel**" means channels on the System which are designated or dedicated for use by a Person unaffiliated with the Grantee pursuant to 47 U.S.C. § 532.

1.2.19 "**Lockout Device**" means an optional mechanical or electrical accessory to a Subscriber's terminal, which inhibits the viewing of a certain program, certain channel or certain channels provided by way of the Cable System.

✓ 1.2.20 "**Member City**" or "**Member Cities**" means the Minnesota municipalities of Cottage Grove, Newport, St. Paul Park, Woodbury and Grey Cloud Island Township.

1.2.21 "**Node**" means the transition point between optical light transmission (fiber-optic cable) and the RF transmission (coaxial cable) of video and data signals being delivered to and received from the Subscriber's home, or in the case of the Institutional Network, signals being delivered to and received from Institutional Network user sites.

1.2.22 "**Noncommercial**" means, in the context of PEG channels, that particular products and services are not promoted or sold. This term shall not be interpreted to prohibit a PEG channel operator or programmer from soliciting and receiving voluntary financial support to produce and transmit video programming on a PEG channel, or from acknowledging a contribution. In the context of the Institutional Network, particular products or services shall not be sold by the Commission or other I-Net Users, however, the Commission may provide governmental services or products, as distinguished from proprietary services or products, for a fee to other governments or educational institutions.

1.2.23 "**Normal Operating Conditions**" means those service conditions that are within

the control of the Grantee. Conditions that are ordinarily within the control of the Grantee include, but are not limited to, special promotions, pay-per-view events, rate increases, regular peak or seasonal demand periods, maintenance or upgrade of the System (including the I-Net) and the development, operation or maintenance of the Grantee's telephone system. Conditions that are not within the control of the Grantee include, but are not limited to, natural disasters, civil disturbances, power outages, telephone network outages, and severe or unusual weather conditions.

1.2.24 **"PEG"** means public, educational and governmental.

1.2.25 **"Person"** means any individual, partnership, association, joint stock company, joint venture, domestic or foreign corporation, stock or non-stock corporation, limited liability company, professional limited liability corporation, or other organization of any kind, or any lawful successor or transferee thereof, but such term does not include the Member Cities or the Commission.

1.2.26 **"Public Access Channel(s)"** means any channels on the System set aside by the Grantee for Noncommercial use by the general public, as contemplated by applicable law.

1.2.27 **"Right-of-Way"** or **"Rights-of-Way"** means the surface, air space above the surface and the area below the surface of any public street, highway, lane, path, alley, sidewalk, avenue, boulevard, drive, court, concourse, bridge, tunnel, park, parkway, skyway, waterway, dock, bulkhead, wharf, pier, easement or similar property or waters within the Member Cities of the Commission owned by or under control of the Member Cities, or dedicated for general public use by the Member Cities, including, but not limited to, any riparian right, which, consistent with the purposes for which it was created, obtained or dedicated, may be used for the purpose of installing, operating and maintaining a System, and I-Net. No reference herein to a "Right-of-Way" shall be deemed to be a representation or guarantee by the Member Cities or the Commission that its interest or other right to control or use such property is sufficient to permit its use for the purpose of installing, operating and maintaining the System, or I-Net.

1.2.28 **"Right-of-Way Ordinance"** means any ordinance of the Member Cities codifying requirements regarding regulation, management and use of Rights-of-Way in the Member Cities, including registration, fees, and permitting requirements.

1.2.29 **"South Washington County Franchise Area"** means the geographic area consisting of the municipalities of Cottage Grove, Newport, St. Paul Park, Woodbury and Grey Cloud Island Township, Minnesota.

1.2.30 **"South Washington County Telecommunications Commission System"** means the Cable System operated pursuant to this Franchise and located in the member municipalities of the Commission.



of Rights-of-Way, be subject to additional burdens with respect to usage of Rights-of-Way that exceed burdens on similarly situated Rights-of-Way users.

2.6.5 In the event the Grantee cannot determine how to comply with any Right-of-Way requirement of the Member Cities, whether pursuant to this Franchise or other requirement, the Grantee shall immediately provide written notice of such question, including the Grantee's proposed interpretation, to the Commission. The Commission shall provide a written response within ten (10) business days of receipt indicating how the requirements cited by the Grantee apply. The Grantee may proceed in accordance with its proposed interpretation in the event a written response is not received within thirteen (13) business days of mailing or delivering such written question.

2.7 **Rules of Grantee.**

The Grantee shall have the authority to promulgate such rules, regulations, terms and conditions governing the conduct of its business as shall be reasonably necessary to enable said Grantee to exercise its rights and perform its obligations under this Franchise and applicable law, and to assure uninterrupted service to each and all of its Subscribers; provided that such rules, regulations, terms and conditions shall not be in conflict with provisions hereto, the rules of the FCC, the laws of the State of Minnesota, the Commission, or any other body having lawful jurisdiction.

2.8 **Territorial Area Involved.**

This Franchise is granted for the corporate boundaries of the Member Cities of the Commission, as they exist from time to time; provided, however, that the Grantee shall not be required to extend service beyond its present System boundaries except pursuant to the line extension requirements set forth in Section 4.3 herein.

2.9 **Written Notice.**

All notices, reports or demands required to be given in writing under this Franchise shall be deemed to be given when delivered personally to any officer of the Grantee or the Commission's designated Franchise administrator, or forty-eight (48) hours after it is deposited in the United States mail in a sealed envelope, with registered or certified mail postage prepaid thereon, addressed to the party to whom notice is being given, as follows:

If to Commission: South Washington County Telecommunications Commission  
7584 80<sup>th</sup> Street South  
Cottage Grove, Minnesota 55016  
Attention: Cable Administrator

## **EXHIBIT 2**

**PSID#020135**

MN0396	COTTAGE GROVE
MN0400	GREY CLOUD ISLAND
MN0397	NEWPORT
MN0401	ST PAUL PARK
MN0395	WOODBURY

### **EXHIBIT 3**



# **ULTIMATE** package 225+ digital channels

Print channels for ZIP Code 55016

PRINT

## EN ESPAÑOL

Cartoon Network (Este) HD	296	Univision (Este)	402	Univision On Demand	1402	mun2	410
ONCE México*	447	Univision Deportes	455	V-me*	440		

## NATIONALS

3net (HD)	107	Discovery Fit & Health	261	ION Television	305	QVC	275
A&E	265	Disney Channel (East)	290	ION Television West	306	RFD TV	345
ABC Family	311	Disney Channel (West)	291	Independent Film Channel (IFC)	559	ReelzChannel	238
AXSTV HD	340	Disney Junior Channel	289	Investigation Discovery (ID)	285	ReelzChannel On Demand	1238
AXSTV HD On Demand	1340	Disney XD	292	Jewelry Television	313	SOAPnet	262
American Movie Classics (AMC)	254	Documentary Channel	267	Jewish Life Television*	366	Science Channel	284
Animal Planet	282	E! Entertainment	236	Lifetime	252	ShopNBC	316
Audience Network	239	ESPN	206	Lifetime Movie Network	253	Speed Channel	607
Audience Network On Demand	1239	ESPN 3D (HD)	106	Lifetime Movie Network	1253	Spike	241
BBC America	264	ESPN2	209	Lifetime On Demand	1252	Style	235
BYU TV	374	ESPNEWS	207	LinkTV	375	Style On Demand	1235
BabyFirstTV*	293	ESPNU	208	Logo	272	Syfy Channel	244
Big Ten Network	610	EWTN	370	Logo On Demand	1272	TBS	247
Biography Channel	266	Enlace Christian Television*	448	MHz WORLDVIEW*	2183	TCT Network	377
Black Entertainment Television (BET)	329	FUEL TV	618	MLB Network	213	TLC	280
Bloomberg Television	353	FX	248	MSNBC	356	TNT	245
Boomerang	298	Food Network	231	MTV	331	TV Guide Network	273
Bravo	237	Fox Business Network	359	MTV2	333	TV Land	304
CBS Sports Network	613	Fox Movie Channel	258	Military Channel	287	TV Land On Demand	1304
CMT	327	Fox News Channel	360	NASA TV	346	TV One	328
CNBC	355	Free Speech TV*	348	NBA TV	216	TeenNick	303
CNBC World	357	Fuse	339	NBCS	220	TeenNick On Demand	1303
CNN	202	GEM NET (Global Expansion Media Network)*	2068	NFL Network	212	Tennis Channel	217
CSPAN 1	350	GOD TV	365	NHL Network	215	The Sportsman Channel - ELNUS	605
CSPAN 2	351	GSN	233	NRB	378	The Sportsman Channel On Demand-ELNUS	1605
Cartoon Network (East)	296	Galavision	404	Nat Geo WILD	283	The Word Network	373
Cartoon Network (West)	297	Golden Eagle Broadcasting*	363	National Geographic Channel	276	Travel Channel	277
Centric	330	Golf Channel	218	Nick Jr.	301	Trinity Broadcasting Network (TBN)	372
Chiller	257	Great American Country	326	Nick Jr. On Demand	1301	TruTV	246
Christian Television Network (CTN)	376	H2	271	Nick at Nite On Demand	1801	Turner Classic Movies (TCM)	256
Church Channel	371	H2 On Demand	1271	Nickelodeon (East)	299	USA Network	242
Cinemoi	259	HITN*	438	Nickelodeon (West)	300	VH1	335
Cloo	308	Hallmark Channel	312	Nickelodeon On Demand	1300	VH1 Classic	337
Comedy Central	249	Headline News	204	Nicktoons Network	302	Velocity	281
Cooking Channel	232	History Channel	269	OWN	279	WE: Women's Entertainment	260
Current TV	358	Home & Garden Television (HGTV)	229	Ovation	274	WGN America	307
DIY Network	230	Home Shopping Network	240	Oxygen	251	Weather Channel	362
Daystar	369	Hope*	368	PBS	0	World Harvest Television	367
Destination America	286	Hub	294	PBS Kids Sprout	295	gmc - Uplifting Entertainment	338
Discovery Channel	278	INSP	364	Pursuit Channel	604	n3D	103

## PREMIUMS

ENCORE (East)	535	ENCORE Family	542	ENCORE® ON DEMAND	1535	THE MOVIE CHANNEL™ ON DEMAND	1554
ENCORE (West)	536	ENCORE Love	537	Fox Soccer Channel	619	TVG - The Interactive Horseracing Network	602
ENCORE Action	541	ENCORE Suspense	539	Sundance Channel	558	The Movie Channel (East)	554
ENCORE Drama	540	ENCORE Westerns	538	Sundance ON DEMAND	1558	The Movie Channel (West)	555



REGIONAL SPORT NETWORKS													
FS North		HD	668										
SATELLITE RADIO													
SONICTAP: 60's Revolution		803	SONICTAP: College Rock		831	SONICTAP: Irish		883	SONICTAP: Retro Disco		845		
SATELLITE RADIO													
SONICTAP: 70's Hits		804	SONICTAP: Dance		859	SONICTAP: Italian		881	SONICTAP: Rock en Espanol		878		
SONICTAP: 8-Tracks		840	SONICTAP: Familiar Favorites		880	SONICTAP: Bistro Blend			SONICTAP: Salsa		874		
SONICTAP: 80's Hits		805	SONICTAP: Fiesta Tropical		870	SONICTAP: Jazz		852	SONICTAP: Showtunes		823		
SONICTAP: 90's Hits		806	SONICTAP: Flashback/New Wave		839	SONICTAP: Latin Hits		871	SONICTAP: Silky Soul		843		
SONICTAP: Adult Alternative		832	SONICTAP: Folk Rock		813	SONICTAP: Latin Jazz		879	SONICTAP: Silver Screen		822		
SONICTAP: Adult Contemporary		821	SONICTAP: Full Metal Jacket		830	SONICTAP: Light Classical		866	SONICTAP: Singer-Songwriters		836		
SONICTAP: Alternative		834	SONICTAP: Gospel		827	SONICTAP: Love Songs		819	SONICTAP: Smooth Jazz		851		
SONICTAP: Bailamos!		869	SONICTAP: Glory			SONICTAP: Malt Shop Oldies		802	SONICTAP: Soft Hits		849		
SONICTAP: Be-Tween		867	SONICTAP: Great Standards		855	SONICTAP: Mariachi		876	SONICTAP: Spike		841		
SONICTAP: Beautiful Instrumentals		820	SONICTAP: Groove Lounge		824	SONICTAP: Metro Blend		853	SONICTAP: SubTerranean		858		
SONICTAP: Big Band/Swing		801	SONICTAP: Hair Guitar		829	SONICTAP: Modern Country		814	SONICTAP: Symphonic		864		
SONICTAP: Bluegrass		812	SONICTAP: Hallelujah		828	SONICTAP: Modern Workout		860	SONICTAP: The Boombox		846		
SONICTAP: Blues		854	SONICTAP: Hit Country		809	SONICTAP: Musica De Las Americas		872	SONICTAP: The Playground		868		
SONICTAP: Classic Hits Blend		837	SONICTAP: Holidays & Happenings		815	SONICTAP: New Age		856	SONICTAP: The Spirit		826		
SONICTAP: Classic Jazz Vocal Blend		850	SONICTAP: Honky Tonk Tavern		811	SONICTAP: Old School Funk		844	SONICTAP: Today's Hits		816		
SONICTAP: Classic R&B		842	SONICTAP: Hot Jamz		825	SONICTAP: PUMP!		861	SONICTAP: Traditional Country		808		
SONICTAP: Classic Rock		833	SONICTAP: Hottest Hits		818	SONICTAP: Rat Pack		807	SONICTAP: Tranquility		884		
SONICTAP: Classic Rock Workout		862	SONICTAP: Hurbano		875	SONICTAP: Reality Bites		838	SONICTAP: Y2k Hits		817		
SONICTAP: Coffeehouse Rock		848	SONICTAP: Hype		847	SONICTAP: Red, Rock and Blues		810	SONICTAP: Zen		857		
			SONICTAP: Ink'd		835	SONICTAP: Reggae		863					
LOCALS													
KARE (NBC)		HD	11	KPXM (ION)		41	KTCA (PBS)		HD	2	WFTC (MNT)	HD	29
KAWB (PBS)			22	KSTC		45	KTCI2 (PBS)			17	WUCW (CW)	HD	23
KMSP (FOX)		HD	9	KSTP (ABC)		HD	5	WCCO (CBS)		HD	4		

\*The following channels require a special dish or equipment: MHz, GEM NET, Hope Channel, JLTv, Once, HITN, V-Me, Enlace, Golden Eagle Broadcasting, and Free Speech TV. Please call 1-800-531-5000 for more information.

# THERE'S SOMETHING FOR EVERYONE

## America's Top 120

A&E	A&E	HD	118
ABC	ABC Family	HD	163
ALIVE	Animal Live		219
ANGEL	Angel One		282
ANGEL2	Angel Two		288
AXS	AXS TV	HD ONLY	131
BT	Business Television		9802
BUY!	Buy!		221
TOON	Cartoon Network (E) <sup>SAP</sup>	HD	176
TOONW	Cartoon Network (W)	HD	177
CCTV	CCTV-E		884
CCNEWS	CCTV-News		285
CHRC	Church Channel		258
CMT	CMT	HD	168
CNBC	CNBC	HD	208
CMN	Comedy Central	HD	200
CMYD	Comedy Central	HD	107
CSPN2	C-SPAN2		211
DYSTR	Daystar		283
DISC	Discovery Channel	HD	182
DISE	Disney Channel (E) <sup>SAP</sup>		172
DISW	Disney Channel (W)		173
DOC	Documentary Channel		197
ET	Entertainment Television	HD	166
ESPN	ESPN	HD	140
ESPN2	ESPN2	HD	144
ESNWS	ESPN News		142
ESPNU	ESPN2		141
FOOD	Food Network	HD	110
FXNWS	FOX News Channel	HD	205
FX	FX <sup>SAP</sup>		136
GEMS	Gems & Jewelry TV	HD	229
HGTV	HGTV	HD	112
HIST	History	HD	120
HNN	HLN	HD	202
HRTV	HorseRacing TV		404
HSN	HSN		84
HSN2	HSN2		226
ICTV	In Country Television		230
INSP	Inspiration Network		259
ION	ION (E)		216
IONW	ION (W)		217
JTV	Jewelry Television		227
LIFE	Lifetime	HD	108
MALL	Mail		220
MTV	MTV	HD	160
MTV2	MTV2	HD	161
NICK	Nick/Nick at Nite (E) <sup>SAP</sup>	HD	170
NICKW	Nick/Nick at Nite (W)		171
PRAYR	Prayer		256
QVC	QVC		137
REELZ	ReelzChannel	HD	299
SALE	Sale		225
SHOP	shop		224
SHNBC	ShopNBC		228
SBN	SonLife Broadcasting Network		257
SPIKE	Spike TV	HD	168
SYFY	Syfy	HD	122
TBS	TBS <sup>SAP</sup>	HD	139
TLC	TLC	HD	183
TNT	TNT <sup>SAP</sup>	HD	138
TRV	Travel Channel		198
TVGAM	TV Game Network		405
TVGN	TV Guide Network		117
TVLND	TV Land		106
USA	USA <sup>SAP</sup>	HD	105
VH1	VH1	HD	182
TWC	Weather Channel	HD	214

## America's Top 200

includes all of America's Top 120 and the channels listed below.

APL	Animal Planet	HD	184
BBCA	BBC America	HD	135
BET	BET	HD	124
BIG10	Big Ten Network <sup>1</sup>	HD	439
BRAVO	Bravo	HD	129
CBSSN	CBS Sports Network	HD	158
CURNT	Current TV		215
DISXD	Disney XD <sup>SAP</sup>		174
FOX8	Fox Business Network	HD	206
G4	G4	HD	191
GLVSN	GaleVision		273
GOLF	Golf Channel	HD	401
GSN	GSN	HD	116
HLMRK	Hallmark Channel	HD	185
HUB	Hub		179
ID	Investigation Discovery	HD	192
LHN	Lifetime Movie Network	HD	109
MLBN	MLB Network	HD	152
MSNBC	msnbc	HD	209
NTGEO	National Geographic Channel	HD	186
NBA TV	NBA TV	HD	156
NFL	NFL Network	HD	154
NHLN	NHL Network	HD	157
NICK	Nick Jr.	HD	189
NUVO	nuvoTV		197
OWATN	Ovation		291
OWN	OWN: Oprah Winfrey Network	HD	189
OXYGN	Oxygen		127
RFD-TV	RFD-TV	HD	231
SCI	Science	HD	193
SOAP	SOAPnet	HD	253
SPEED	SPEED	HD	150
STYLE	Style	HD	115
TNCK	TeenNick		181
TFRAE	TeleFutura (E) <sup>1</sup>		271
TFRAW	TeleFutura (W) <sup>1</sup>	HD	272
TRUTV	truTV	HD	204
TURN	Turner Classic Movies	HD	132
UNVSN	Univision (E)	HD	270
UNVSW	Univision (W)		928
UDEP	Univision Deportes Network		869

### General Channels<sup>1</sup>

BABY1	BabyFirstTV	9400
BLOCK	Blockbuster Studio Channel	102
BYUTV	BYUTV	9403
CTN	Christian Television Network	287
ARTS	Classic Arts Showcase	9406
CSPAN	C-SPAN	210
DN101	DISH 101	101
EARTH	DISH Earth	287
HOM	DISH HOME (not available on Hopper)	100
ENLC	Enlace	9411
EWITN	Eternal Word Television <sup>SAP</sup>	261
PREVW	Free Preview Guide	103

### Local Networks

ABC	OCBS	NBC	FOX
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### Regional Sports Networks<sup>1</sup>

Hopper	412
All other receivers	408-437

<sup>1</sup>HD - Channels are broadcast in SD and HD unless noted as **HD ONLY**. To view channels broadcast in HD, you need an HD TV, a DISH HD receiver, and a DISH HD add-on package.

**BOLD** - Channels in bold are some of our most popular channels. <sup>SAP</sup> - Surround audio feed available. Audio downmixable on crystal. Available on select HD channels.

## America's Top 250

includes all of America's Top 200 and the channels listed below.

BIO	Bio	HD	119
BITV	Bloomberg Television	HD	203
BOOM	Boomerang <sup>SAP</sup>		175
CHILR	Chiller		199
CLOO	cloo		198
COOK	Cooking Channel	HD	113
AMERI	Destination America	HD	194
DIY	DIY	HD	111
ENCOR	Encore (E)	HD ONLY	340
ENCROW	Encore (W) <sup>SAP</sup>		341
EACTN	Encore Action		343
EDRAM	Encore Drama		345
ENFAM	Encore Family		347
ELOVE	Encore Love		346
ESUSP	Encore Suspense		344
EWSTN	Encore Westerns		342
EPKDR	EPK DRIVE-IN <sup>SAP</sup>		292
FOXMO	Fox Movie Channel		133
FSC	Fox Soccer Channel	HD	406
FUEL	FUEL TV		398
GMC	gmc		188
GAC	Great American Country (GAC)		165
H2	H2	HD	121
HMC	Hallmark Movie Channel	HD	187
MIL	Military Channel		195
MPLX	MoviePlex		377
MUN2	mun2		838
NATGEO	Nat Geo WILD	HD	190
NBCSP	NBC Sports Network	HD	159
NICKT	Nicktoons Network		178
OTDCH	Outdoor Channel		399
RURAL	Rural TV		232
SPMAN	Sportsman Channel	HD	395
TENNIS	Tennis Channel	HD	400
TMC-W	The Movie Channel (W) <sup>SAP</sup>		329
VERIA	Veria	HD	218
VH1CL	VH1 Classic		163

### DISH Music Channels

Hopper	98
All other receivers	923-946

FSTV	Free Speech TV	9415
KBS	KBS World <sup>1</sup>	9394
KTV	Kids & Teens Television (KTV)	264
LINK	Link TV	9410
NASA	NASA	212
ONPPV	Pay-Per-View Guide	500
PNTGN	Pentagon	9405
TBN	TBN	260
IMPCT	The Impact Network	9397
3ABN	Three Angels Broadcasting Network	9393
VME	V-ME	9414

### Pay-Per-View

MOVIE	DISH Cinema	1
MOVIE	DISH Cinema	500-558
SPORT	Sports & Events	454-472

<sup>1</sup>Channel availability based on one or more of the following: geographical location, time zone, programming package, dish antenna. <sup>2</sup>Available with Multi-Sport Pack or a minimum of America's Top 120 Plus package.

## Smart Pack

ALIVE	Animal Live	219
ANGEL	Angel One	282
ANGEL2	Angel Two	288
APL	Animal Planet	184
BIO	Bio	119
BITV	Bloomberg Television	203
BOOM	Boomerang <sup>SAP</sup>	175
BUY!	Buy!	221
CBSSN	CBS Sports Network	158
CCTV-E	CCTV-News	884
CCTV	CCTV-News	285
COOK	Cooking Channel	113
CSPN2	C-SPAN2	211
DYSTR	Daystar	283
DIY	DIY	111
DOC	Documentary Channel	197
FOOD	Food Network	110
FXNWS	FOX News Channel	205
GEMS	Gems and Jewelry	229
GAC	Great American Country (GAC)	165
HLMRK	Hallmark Channel	185
HMC	Hallmark Movie Channel	187
HLN	HLN	202
HSN	HSN	84
HSN2	HSN2	226
HUB	Hub	179
ICTV	In Country Television	230
JTV	Jewelry Television	227
MALL	Mail	220
NICK	Nick/Nick at Nite (E)	170
NICKW	Nick/Nick at Nite (W)	171
NICKT	Nicktoons Network	178
OTDCH	Outdoor Channel	396
QVC	QVC	137
RFD-TV	RFD-TV	231
SALE	Sale	225
SCI	Science	193
SHOP	shop	224
SHNBC	ShopNBC	228
TVLND	TV Land	106
TWC	Weather Channel	214



# dish

For the most up-to-date Channel Lineup Card, please visit [mydish.com/channelcard](http://mydish.com/channelcard).



## CHANNELS AND PACKAGES

### Premium Movie Packages

<b>HBO</b>			
HBO-E	HBO (E) SAP	HD	300
HBO2E	HBO2 (E) SAP	HD	301
HBO2SG	HBO Signature SAP	HD	302
HBO-W	HBO (W) SAP	HD	303
HBO2W	HBO2 (W) SAP	HD	304
HBOFM	HBO Family SAP	HD	305
HBOCY	HBO Comedy SAP	HD	307
HBOZ	HBO Zone	HD ONLY	308
HBOLT	HBO Latino	HD	309

### CINEMAX

MAX-E	Cinemax (E) SAP	HD	310
MAX-W	Cinemax (W) SAP	HD	311
MOMAX	MoreMAX SAP	HD	312
ACMAX	ActionMAX SAP	HD	313
5-MAX	5StarMAX SAP	HD	314

### SHOWTIME

SHO-E	Showtime (E) SAP	HD	318
SHO-W	Showtime (W) SAP	HD	319
SHOTO	Showtime 2 SAP	HD	320
SHOCS	Showtime ShowCase SAP	HD	321
SHOEX	Showtime Extreme SAP	HD	322
SBYND	Showtime Beyond SAP	HD	323
TMC-E	The Movie Channel (E) SAP	HD	327
TMCXE	The Movie Channel extra (E) SAP	HD	328
FLUX	FLUX		333

### STARZ

ENCOR	Encore (E) SAP	HD	340
STARZ	Starz (E) SAP	HD	350
STRZV	Starz (W) SAP	HD	351
SEDGE	Starz Edge SAP	HD	352
SCINE	Starz Cinema SAP	HD	353
STZC	Starz Comedy	HD	354
SBLCK	Starz InBlack SAP	HD	355
SK&FM	Starz Kids & Family SAP	HD	356

### Mini-Packs

<b>epix</b>			
EPIX1	EPIX 1 SAP	HD	380
EPIX2	EPIX 2 SAP	HD	381
EPIX3	EPIX 3 SAP	HD ONLY	382
EPXDR	EPIX DRIVE-IN SAP		292

### encore Movie Pak

ENCRW	Encore (W) SAP		341
EACTN	Encore Action		343
EDRAM	Encore Drama		345
ENFAM	Encore Family		347
ELOVE	Encore Love		346
ESUSP	Encore Suspense		344
EWSTN	Encore Westerns		342
MPLEX	MoviePlex		377

### Mini-Packs

**Blockbuster @Home**  
100,000 movies, shows and games by mail, thousands of titles streamed to your TV with an HD DVR connected to broadband Internet, 25,000 titles available on dishonline.com.

CTRC	Centric	HD ONLY	371
CI	Crime & Investigation	HD ONLY	388
ESUSP	Encore Suspense		344
EPIX1	EPIX SAP	HD	380
EPIX2	EPIX2 SAP	HD	381
EPIX3	EPIX3 SAP	HD ONLY	382
HMC	Hallmark Movie Channel	HD	187
HDNMV	HDNet Movies	HD ONLY	383
INDIE	IndiePlex		378
LOGO	LOGO	HD ONLY	373
MAVTV	MAVTV American Real		361
MGM	MGM	HD ONLY	385
MPLEX	MoviePlex		377
PLDIA	PaRadia	HD ONLY	389
PIXL	PixL	HD	388
RETRO	RetroPlex	HD ONLY	379
SMC	Sony Movie Channel	HD ONLY	386
SCINE	Starz Cinema		353
UNIHD	Universal HD	HD ONLY	366
VLCTY	Velocity	HD ONLY	364
WFN	World Fishing Network		394

### Heartland

BABY	Baby TV SAP		824
GMC	gmc		188
GSN	GSN	HD	116
HLMRK	Hallmark Channel	HD	185
HMC	Hallmark Movie Channel	HD	187
HUB	Hub	HD	179
OWN	OWN: Oprah Winfrey Network	HD	199
PIXL	PixL SAP	HD	383
RFDTV	RFD-TV	HD	231
RURAL	Rural TV		232

### Outdoor Sports

MAVTV	MAVTV American Real HD	HD ONLY	361
QTDCH	Outdoor Channel		386
SPMAN	Sportsman Channel	HD	395
WFN	World Fishing Network		394

### Mult-Sport

ESPCL	ESPN Classic		143
FSC	Fox Soccer Channel	HD	406
FUEL	FUEL TV		398
MLBN	MLB Network	HD	152
MLBSZ	MLB Network Strike Zone		153
NFL	NFL Network	HD	154
NFLRZ	NFL RedZone	HD	155
NBATV	NBA TV	HD	156
NHLN	NHL Network	HD	157
USN	Universal Sports		402

Plus over 25 Regional Sports Networks

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[twitter.com/dish](https://twitter.com/dish)

[DISH 101 - Support Channel \(Ch. 101\)](https://dish101.com)



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## **EXHIBIT 4**

#### Pay-Per-View

501-503 IN Demand Pay-Per-View Events  
**504 IN Demand Pay-Per-View Events HD**  
 544 Adult Pay-Per-View  
 546 Adult Pay-Per-View  
 701-706 ESPN Game Plan/Full Court  
 751-760 NBA League Pass/MLS Direct Kick  
**761 IN Demand Team HD**  
**762 IN Demand Game HD**  
 771-784 MLB Extra Innings/NHL Center Ice

#### MultLatino Packages

##### MultLatino

Available a la carte with subscription to Limited Basic

601 Discovery en Espanol  
 602 CNN en Espanol  
 603 FOX Deportes  
 604 beIN Sport en Espanol  
 605 t3a  
 606 History en Espanol  
 607 mun2  
 608 Cine Latino  
 609 Viendo Movies  
 610 Cine Mexicano  
 611 Centro Americana  
 612 ESPN Deportes  
 613 UniMas  
 614 UniMas Este  
 615 Univision Este  
 616 Telemundo Alt  
 618 Rlmoson Latino  
 619 Telehit  
 620 nuvoTV  
 621 HTV Musica  
 622 Video Rola  
 623 Bandamax  
 624 Telemundo  
 625 Galavisión  
 626 Vme Kids  
 627 Discovery Familia  
 628 Once TV Mexico  
 629 HTN  
 630 CBTV Michoacan  
 633 BabyFirst Americas en Espanol  
 635 EWTN en Espanol  
 638 La Familia Network  
 637 TBN Enlace  
 640 TeleFormula  
 644 SUR TV  
 646 Canal 52MX  
 647 Mexicana Network  
 648 MultiMedios TV  
 650 LAS  
 651 Caracol  
 653 WAPA America  
 655 Ecuavisa

656 Telefe  
 657 TV Chile  
 658 TV Columbia  
 659 TV Dominica  
 660 TV Venezuela  
 661 Ullisima  
 670 TVE Internacional  
 673 SUR Peru  
 675 HBO Latino  
 680 Gran Cine  
 681 De Pelicula  
 683 De Pelicula Clasico  
 684 Pasiones

##### MultLatino Plus

Includes Limited Basic and MultLatino

##### MultLatino Extra

Includes Limited Basic, Digital Economy and MultLatino

##### MultLatino Max

Includes Limited Basic, Digital Economy, MultLatino and the following channels:

24 ESPN2  
 25 ESPN  
 27 FSN North  
 28 TNT  
 39 TLC  
 45 Nickelodeon  
 49 Spike  
 52 VH1  
 53 MTV  
 55 Syfy  
 56 Golf Channel  
 60 TBS  
 66 Bravo  
 68 NBC Sports Network  
 103 OWN  
 114 BBC America  
 119 LMN  
 128 Sprout  
**192/817 TLC HD**  
**194/824 Syfy HD**

**196/826 TBS HD**  
**201/863 FSN North HD**  
**202/864 ESPN HD**  
**203/865 ESPN2 HD**  
**204/879 TNT HD**  
**206/877 NBC Sports Network HD**  
**207/882 Golf Channel HD**  
**835 LMN HD**  
**840 Nickelodeon HD**  
**853 MTV HD**  
**854 VH1 HD**  
**866 Spike HD**  
**880 Bravo HD**  
**819 BBC America HD**  
**927 Sprout HD**

##### MultLatino Ultra

Includes Limited Basic, Digital Economy, Digital Preferred and additional channels on MultLatino Max

A minimum subscription to Limited Basic is required to receive other services or other levels of video programming. HD programming is only available to customers with an HDTV set (not provided by Comcast) and a digital converter with HDTV capabilities. A subscription to certain services may be required to receive certain HD programming. A monthly HD Technology fee is also required to receive HD programming. 3D programming is only available to customers with a minimum subscription to the Digital Starter package, a full 3D HDTV set (not provided by Comcast) and a digital converter with 3D HD capabilities. A monthly 3D Technology fee and a monthly HD Technology fee are required to receive 3D programming. Channel offerings and required service levels are subject to change. Please contact 1-800-XFINITY with questions.



# xfinity

## XFINITY® TV Channel Line up



Effective January 2013

St. Croix

MN-013

COMCAST

# XFINITY TV

Channels in bold are HD

## Limited Basic

to view these channels

## Family Tier

Includes Limited Basic

- 2 TPT-2-PBS
- 3 KPXM-ION
- 4 WCCO-CBS
- 6 Metro 6 Regional Access
- 8 WUCW-CW
- 9 KMSP-FOX
- 10 WFTC-MNT
- 11 KARE-NBC
- 12 KSTC-IND
- 13 Local Programming
- 14 Public Access
- 15 Educational Access
- 16 Government Access
- 17 TPT-Lite-PBS
- 18 VAC Inspirational Access (Clrl. St Croix)
- 19 South Washington City
- 19 Prescott Community Television (Hastings)
- 19 C-SPAN
- 22 QVC
- 23 WGN America
- 80 Shop NBC\*
- 81 Jewelry TV\*
- 96 HSN
- 99 WUMN-Universal
- 104 C-SPAN2\*
- 127 TV Guide Network\*
- 231/805 KSTP HD (ABC)\*
- 232/811 KARE HD (NBC)\*
- 233/804 WCCO HD (CBS)\*
- 234/809 KMSP HD (FOX)\*
- 235/808 WUCW HD (CW)\*
- 236/807 WFTC HD (MNT)\*
- 237/803 KPXM HD (ION)\*
- 238/812 KSTC HD (IND)\*
- 240/802 TPT HD (PBS)\*
- 243 TPT-Minnesota\*
- 244 TPT-Weather\*
- 245 ThisTV\*
- 246 Me TV\*
- 247 AntennaTV\*
- 249 KARE 11 Weather/Now\*
- 253 The Country Network\*
- 291 EWTN\*
- 401-446 Music Choice\*
- 599 XFINITY Latino\*
- 810 WGN America HD\*
- 937 BMA Black Music America\*

## Digital Economy

Includes Limited Basic

- 32 HLN
- 33 Food Network
- 35 The Weather Channel
- 41 HGTV
- 44 Disney Channel
- 45 Nickelodeon
- 109 National Geographic Channel
- 110 Sciencia
- 121 DIY
- 128 Sprout
- 130 The Hub
- 133 TeenNick
- 135 Disney XD
- 290 TBN
- 30 Fox News Channel
- 31 CNN
- 32 HLN
- 33 Food Network
- 34 Animal Planet
- 35 The Weather Channel
- 36 A&E
- 37 Discovery Channel
- 38 History
- 40 AMC
- 42 USA Network
- 43 Lifetime
- 44 Disney Channel
- 45 Nickelodeon
- 46 ABC Family
- 47 Cartoon Network
- 48 FX
- 49 Spike
- 50 Comedy Central
- 51 E!
- 54 BET
- 58 truTV
- 61 TV Land
- 67 Hallmark Channel
- 116 H2
- 191/816 Discovery Channel HD
- 193/818 Animal Planet HD
- 195/825 USA Network HD
- 197/827 Food Network HD
- 199/829 A&E HD
- 212/823 History HD
- 213/842 CNN HD
- 222/831 AMC HD
- 230/839 Disney Channel HD
- 814 HSN HD

- 816 QVC HD
- 833 Hallmark Channel HD
- 836 Lifetime HD
- 841 The Weather Channel HD
- 844 Fox News Channel HD
- 848 truTV HD
- 852 E! HD
- 856 BET HD
- 860 Comedy Central HD
- 861 Cartoon Network HD
- 882 H2 HD

## Digital Starter

Includes Limited Basic

- 1 ON DEMAND
- 24 ESPN2
- 25 ESPN
- 27 FSN North
- 28 TNT
- 29 CNBC
- 30 Fox News Channel
- 31 CNN
- 32 HLN
- 33 Food Network
- 34 Animal Planet
- 35 The Weather Channel
- 36 A&E
- 37 Discovery Channel
- 38 History
- 39 TLC
- 40 AMC
- 41 HGTV
- 42 USA Network
- 43 Lifetime
- 44 Disney Channel
- 45 Nickelodeon
- 46 ABC Family
- 47 Cartoon Network
- 48 FX
- 49 Spike
- 50 Comedy Central
- 51 E!
- 52 VH1
- 53 MTV
- 54 BET
- 55 Syfy
- 56 Golf Channel
- 58 truTV
- 60 TBS
- 61 TV Land
- 62 Travel Channel
- 64 Big Ten Network
- 65 Speed
- 66 Bravo
- 67 Hallmark Channel
- 68 NBC Sports Network
- 70 MSNBC
- 103 OWN
- 105 C-SPAN3
- 111 Investigation Discovery
- 114 BBC America
- 115 bio.
- 116 H2
- 118 Style
- 119 LMN
- 128 Sprout
- 136 Hallmark Movie Channel
- 149 MoviePlex
- 162 G4
- 166 FEARnet
- 189 gmc
- 181/818 Discovery Channel HD
- 192/817 TLC HD
- 193/818 Animal Planet HD
- 194/824 Syfy HD
- 196/825 USA Network HD
- 196/826 TBS HD
- 197/827 Food Network HD
- 198/828 HGTV HD
- 199/829 A&E HD
- 201/863 FSN North HD
- 202/864 ESPN HD
- 203/865 ESPN2 HD
- 204/879 TNT HD
- 205/883 Velocity HD
- 206/877 NBC Sports Network HD
- 207/862 Golf Channel HD
- 208/907 Universal HD
- 209/885 Palladia HD
- 212/823 History HD
- 213/842 CNN HD
- 222/831 AMC HD
- 229/838 ABC Family HD
- 230/839 Disney Channel HD
- 251 Bloomberg TV
- 255 Big Ten Network
- 256/867 Big Ten Network HD
- 624 Telemundo
- 692-693 Comcast/Big Ten Network Xtra
- 814 HSN HD
- 815 QVC HD
- 820 Travel Channel HD
- 830 FX HD
- 833 Hallmark Channel HD
- 834 Hallmark Movie Channel
- 835 LMN HD
- 836 Lifetime HD
- 840 Nickelodeon HD
- 841 The Weather Channel HD
- 843 HLN HD
- 844 Fox News Channel HD
- 845 MSNBC HD

- 846 CNBC HD
- 848 truTV HD
- 849 bio. HD
- 850 Style HD
- 851 gmc HD
- 852 E! HD
- 854 VH1 HD
- 856 BET HD
- 858 G4 HD
- 861 Comedy Central HD
- 861 Cartoon Network HD
- 866 Spike HD
- 880 Bravo HD
- 882 H2 HD
- 884 Investigation Discovery HD
- 887 XFINITY 3D
- 888 ESPN 3D
- 917 Bloomberg TV HD
- 919 BBC America HD
- 927 Sprout HD

## Digital Preferred

Includes Digital Starter

- 57 TCM
- 59 GAC
- 101 WeatherScan Local
- 102 ESPNNews
- 106 Fox Business Network
- 107 Current TV
- 108 Nat Geo WILD
- 109 National Geographic Channel
- 110 Science
- 112 Military Channel
- 113 Destination America
- 117 We tv
- 120 SOAPnet
- 121 DIY
- 122 Cooking Channel
- 128 Nicktoons
- 130 The Hub
- 131 Nick Jr
- 132 Nick 2
- 133 TeenNick
- 134 Encore Family
- 135 Disney XD
- 137 Disney Junior
- 139 MTV Hits
- 140 MTV2
- 141 i3s
- 142 MTV Jams
- 143 VH1 Classic
- 144 Centric
- 146 CMT
- 148 Fuse
- 150 Encore
- 152 Encore Action
- 154 Encore Suspense
- 156 Encore Love
- 158 Encore Drama
- 160 Encore Westerns
- 161 Ovalton
- 163 LOGO
- 164 IFC
- 167 IndiePlex
- 168 RetroPlex
- 170 Fix
- 171 Aspire
- 173 TV One
- 176 BabyFirst Americas
- 179 GSN
- 180 NFL Network
- 181/876 NFL Network HD
- 182 Discovery Fit & Health
- 185 Oxygen
- 186 Smithsonian Channel
- 187 BBC World News
- 200/819 National Geographic Channel HD
- 211/822 Science HD
- 257/874 NBA TV HD
- 260 RealzChannel
- 269 ESPN
- 270 Outdoor Channel
- 272 MLB Network
- 273 NBA TV
- 274 CBS Sports Network
- 275 NFL Network
- 276 NHL Network
- 278 Sportsman Channel
- 290 TBN
- 294 The Word
- 607 mun2
- 620 nuvoTV
- 625 Galavision
- 749 NBA TV
- 821 Destination America HD
- 832 TCM HD
- 837 Disney XD HD
- 847 Fox Business Network HD
- 865 CMT HD
- 867 TV One HD
- 868 Fuse HD
- 868 ESPNNews HD
- 869 ESPN HD
- 870 Outdoor Channel HD
- 871 CBS Sports Network HD
- 872 NHL Network HD
- 873 MLB Network HD
- 881 We tv HD
- 906 IFC HD
- 908 Encore HD

- 909 MGM HD
- 921 Galavision HD
- 922 Oxygen HD
- 924 Nat Geo WILD HD
- 925 GSN HD
- 928 The Hub HD

## Digital Preferred Plus

Includes Digital Preferred, HBO and Starz

## Digital Premier

Includes Digital Preferred Plus, Sports Entertainment Package, Cinemax and Showtime

## Sports Entertainment Package

- 102 ESPNNews
- 172 Fox Movie Channel
- 180 NFL Network
- 181/876 NFL Network HD
- 257/874 NBA TV HD
- 262 Fox College Sports Atlantic
- 263 Fox College Sports Central
- 264 Fox College Sports Pacific
- 265 ESPN Classic
- 266 NFL RedZone
- 267 Fox Soccer
- 268/875 NFL RedZone HD
- 270 Outdoor Channel
- 271 Speed
- 272 MLB Network
- 273 NBA TV
- 274 CBS Sports Network
- 275 NFL Network
- 276 NHL Network
- 277 Tennis Channel
- 278 Sportsman Channel
- 281 TV Games
- 282 WFN
- 283 Outside TV
- 285 ESPN Goal Line/Buzzer Beater
- 604 beIN Sport en Espanol
- 749 NBA TV
- 868 ESPNNews HD
- 870 Outdoor Channel HD
- 871 CBS Sports Network HD
- 872 NHL Network HD
- 873 MLB Network HD
- 876 Speed HD
- 915 FOX Soccer HD
- 916 Tennis Channel HD

## Premium Services

- Starz
- 219/869/910 Starz HD
- 370 Starz
- 371 Starz Edge
- 372 Starz In Black
- 373 Starz Kids & Family
- 374 Starz Cinema
- 375 Starz Comedy

## HBO

- 215/300/900 HBO HD
- 301 HBO
- 302 HBO2
- 303 HBO Signature
- 304 HBO Family
- 305 HBO Comedy
- 310 HBO Zone
- 311 HBO Latino
- 901 HBO2 HD
- 903 HBO Latino HD

## Cinemax

- 217/319/930 Cinemax HD
- 320 Cinemax
- 321 MoreMAX
- 324 ActonMAX
- 325 ThrillerMAX

## Showtime

- 218/339/920 Showtime HD
- 335 Showtime Women
- 336 Showtime Family
- 337 Showtime Next
- 340 Showtime
- 341 SHO 2
- 342 Showtime Showcase
- 347 Showtime Extreme

## The Movie Channel

- 350 The Movie Channel
- 352 The Movie Channel Xtra
- 940 The Movie Channel HD
- Adult
- 543 Playboy TV

## International Selections

- 667 NEO Cricket

\* Additional equipment needed

## **EXHIBIT 5**



August 14, 2012  
Davis Wright Tremaine LLP  
1919 Pennsylvania Avenue, N.W.  
Suite 800  
Washington, DC 20006

To Whom It May Concern:

SNL Kagan utilizes a multi-step process to accurately identify cable client franchise areas and associated ZIP and ZIP+4 Codes. (A ZIP+4 Code includes the five digits of the United States Postal Service ZIP Code, a hyphen, and four more digits that determine a more precise location than the ZIP Code.)

This methodology was developed to address the potential shortcomings in utilizing 5-digit ZIP Code data for "Effective Competition" petitions. The basic methodology has been in place for several years and has been used successfully in many Effective Competition cases at the FCC.

Because ZIP Codes and municipal boundaries are created and managed by different government authorities, the boundaries of ZIP Codes and municipal boundaries often overlap. ZIP Codes frequently span between and beyond municipal boundaries. ZIP+4 Codes, however, usually reside in one and only one municipality. SNL Kagan uses Place, Minor Civil Division (MCD), and County boundaries from Dynamap® a division of Pitney Bowes Business Insight, to determine municipal boundaries. SNL Kagan uses the Dynamap® ZIP+4 Centroids database, which contains ZIP+4 centroid correspondence for virtually all deliverable ZIP+4s, to identify ZIP+4 Codes within municipal boundaries, among the over 60 million ZIP+4s in all 50 states, DC, and Puerto Rico, based on current data from the USPS and the U.S. Bureau of the Census, and the Tele Atlas master street database.

SNL Kagan then utilizes its ZIP+4 Code mapping to enable our clients to obtain proper "Direct-to-Home" (DTH) subscriber counts for their respective franchise areas by tracking DTH subscribers at the ZIP+4 Code level. (Where SNL Kagan determines that a ZIP Code falls entirely within a franchise area, however, it is unnecessary to identify DTH subscribers at the ZIP+4 Code level for that 5-digit ZIP Code. In these instances, SNL Kagan identifies such 5-digit ZIP Codes and, accordingly, DTH subscribers are identified by the 5-digit ZIP code only.)

Only ZIP+4 Codes that meet specific criteria are included in this report. The following criteria must be met:

- The centroid of the ZIP+4 Code is within the franchise area; and
- The USPS ZIP+4 Record Type (from Dynamap® ZIP+4 Centroids) is either H- high rise or S - street.

Our methodology has been used by many multiple system operators (MSOs) as part of their Effective Competition relief efforts, and we believe this methodology produces the most accurate and detailed view of ZIP+4 data as it relates to cable franchise areas.

A handwritten signature in black ink, appearing to read "Pinna Gallant", with a long horizontal line extending to the right.

Pinna Gallant  
Senior Product Manager  
SNL Kagan

Financial Institutions | Real Estate | Energy | Media & Communications

One SNL Plaza, PO Box 2124, Charlottesville, VA 22902 | +1.434.977.1600 | +1.434.977.4466 fax

Ahmedabad | Arlington | Boston | Boulder | Islamabad | Jersey City | London | Monterey | New York | Richmond | SNL.com



## **EXHIBIT 6**

### **SBCA ECTR Summary Pages**

**ZIP+4 Data provided on CD included with the exhibit.**

**A hard copy of the ZIP+4 data is available upon request.**

## ECTR – Effective Competition Tracking Report



Provided by  
Satellite Broadcasting and Communications Association

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Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: March 22, 2013

ZIP Codes

DTH Count

Requested total for Cottage Grove, MN	3365
---------------------------------------	------

Data is current through 2/28/2013

Report Prepared by:  
Martin Esteves  
Manager, Membership and Data Management  
202-349-3630  
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

---

## ECTR – Effective Competition Tracking Report



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: March 22, 2013

ZIP Codes

DTH Count

Requested total for Grey Cloud Island, MN	30
---	----

Data is current through 2/28/2013

Report Prepared by:  
Martin Esteves  
Manager, Membership and Data Management  
202-349-3630  
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

## ECTR – Effective Competition Tracking Report



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: March 22, 2013

ZIP Codes

DTH Count

Requested total for Newport, MN	293
---------------------------------	-----

Data is current through 2/28/2013

Report Prepared by:  
Martin Esteves  
Manager, Membership and Data Management  
202-349-3630  
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

---

## ECTR – Effective Competition Tracking Report



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: March 22, 2013

ZIP Codes

DTH Count

Requested total for St Paul Park, MN	530
--------------------------------------	-----

Data is current through 2/28/2013

Report Prepared by:  
Martin Esteves  
Manager, Membership and Data Management  
202-349-3630  
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

## ECTR – Effective Competition Tracking Report



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: March 22, 2013

ZIP Codes

DTH Count

Requested total for Woodbury, MN	6070
----------------------------------	------

Data is current through 2/28/2013

Report Prepared by:  
Martin Esteves  
Manager, Membership and Data Management  
202-349-3630  
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

## **EXHIBIT 7**



H1

## OCCUPANCY STATUS

Universe: Housing units

2010 Census Redistricting Data (Public Law 94-171) Summary File

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see <http://www.census.gov/prod/cen2010/pl94-171.pdf>

NOTE: Change to the California, Connecticut, Mississippi, New Hampshire, Virginia, and Washington P. L. 94-171 Summary Files as delivered.

	Grey Cloud Island township, Washington County, Minnesota	Cottage Grove city, Minnesota	Newport city, Minnesota	St. Paul Park city, Minnesota	Woodbury city, Minnesota
Total:	121	12,102	1,466	2,079	23,568
Occupied	114	11,719	1,354	1,970	22,594
Vacant	7	383	112	109	974

Source: U.S. Census Bureau, 2010 Census.



## **EXHIBIT 8**

<b>Community</b>	<b>State</b>	<b>Total DBS Subscribers</b>	<b>2010 Census Occupied Housing Units</b>	<b>DTH Penetration</b>
COTTAGE GROVE	MN	3,365	11,719	28.71%
GREY CLOUD ISLAND	MN	30	114	26.32%
NEWPORT	MN	293	1,354	21.64%
ST PAUL PARK	MN	530	1,970	26.90%
WOODBURY	MN	6,070	22,594	26.87%
<b>TOTAL FRANCHISE AREA</b>		<b>10,288</b>	<b>37,751</b>	<b>27.25%</b>

## CERTIFICATE OF SERVICE

I, Deborah D. Williams, do hereby certify on this 13<sup>th</sup> day of May, 2013 that a true and correct copy of the foregoing "Petition for Special Relief" has been sent via U.S. mail, postage prepaid to the following:

Ryan Schroeder  
City Administrator  
City of Cottage Grove  
12800 Ravine Parkway South  
Cottage Grove, MN 55016

Clinton P. Gridley  
City Administrator  
City of Woodbury  
8301 Valley Creek Rd.  
Woodbury, MN 55125

Elizabeth Bell  
City Clerk  
City of Grey Cloud Island  
PO Box 4  
St. Paul Park, MN 55071

Fran Hemmesch  
Administrator  
South Washington County  
Telecommunications Commission  
6939 Pine Arbor Drive South #106  
Cottage Grove, MN 55016

Deb Hill  
City Administrator  
City of Newport  
596 – 7<sup>th</sup> Ave.  
Newport, MN 55055

Michael Bradley  
Bradley & Guzzetta, LLC  
1976 Wooddale Drive, Suite 3A  
Woodbury, MN 55125

Kevin Walsh  
City of Administrator  
City of St. Paul Park  
600 Portland Ave.  
St. Paul Park, MN 55071

  
Deborah D. Williams